

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:

(202) 326-7999

December 9, 2019

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) seeking permission to respond to the partially sealed letter submitted on Friday, December 6, 2019, by the Plaintiffs’ Executive Committees (“Plaintiffs”) concerning their purported witness list. Saudi Arabia requests leave to file a letter not exceeding three pages on or before December 11, 2019. Plaintiffs have stated that they oppose this request.

Saudi Arabia anticipates that its response, if authorized, will address (1) why the Court should set a deposition limit for jurisdictional discovery at this time; (2) why Plaintiffs fail to show that more than 10 fact depositions are necessary or appropriate; and (3) why Plaintiffs’ submission fails to comply with the Court’s direction to “stat[e] the scope of information Plaintiffs intend to elicit from each witness,” ECF No. 5297, ¶ 2.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: The Honorable George B. Daniels (via facsimile)  
All MDL Counsel of Record (via ECF)